

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | |
|--|--|
| In Re: | Case No.: 24-21217-CMB |
| SOUTH HILLS OPERATIONS, LLC, <i>et al.</i>,¹ | Chapter 11 |
| Debtors. | <i>Jointly Administered</i> |
| | Doc. No.: |
| SOUTH HILLS OPERATIONS, LLC, <i>et al.</i>, | Related to Document Nos.:779, 879, 898, |
| | 901, 918, 1005, 1164, 1169, 1171, 1173, |
| Movant, | 1174, 1183, 1228, 1265, 1266, 1270, 1271, |
| | 1272, 1274 |
| -vs - | Hearing Date: April 24, 2025 |
| NO RESPONDENTS. | Hearing Time: 10:00 a.m. |
| | Response Deadline: |

**NOTICE OF FINAL AGENDA OF MATTERS SCHEDULED
FOR OMNIBUS HEARING ON APRIL 24, 2025, AT 10:00 AM (EDT)**

¹The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: South Hills Operations, LLC (5527); Monroeville Operations, LLC (3280); Mt. Lebanon Operations, LLC (1133); Murrysburg Operations, LLC (9149); Cheswick Rehabilitation and Wellness Center, LLC (9561); 3876 Saxonburg Boulevard Propco, LLC (3618); North Strabane Rehabilitation and Wellness Center, LLC (1677); 100 Tandem Village Road Propco, LLC (1918); Maybrook-C Briarcliff Opco, LLC (5187); Maybrook-C Briarcliff Propco, LLC (1823); Maybrook-C Evergreen Opco, LLC (5388); Maybrook-C Evergreen Propco, LLC (2000); Maybrook-C Kade Opco, LLC (4033); Maybrook-C Kade Propco, LLC (2097); Maybrook-C Latrobe Opco, LLC (4148); Maybrook-C Latrobe Propco, LLC (2178); Maybrook-C Overlook Opco, LLC (7081); Maybrook-C Overlook Propco, LLC (6804); Maybrook-C Silver Oaks Opco, LLC (7146); Maybrook-C Silver Oaks Propco, LLC (9654); Maybrook-C Whitecliff Opco, LLC (6211); Maybrook-C Whitecliff Propco, LLC (4835). The Debtors' address is 485 Lexington Avenue, 10th Floor, New York, NY 10017.

MATTERS GOING FORWARD:

1. Consent Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure [Doc. No. 779] filed October 13, 2024

Objection/Response Deadline:

- a. March 6, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. Objection and Reservation of Rights to Debtors Consent Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure [Doc. No. 1169] filed March 6, 2025 filed by the Official Committee of Unsecured Creditors
- b. Objection and Reservation of Rights to the Consent Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure [Doc. No.1173] filed March 6, 2025 filed by Commonwealth of Pennsylvania Office of Attorney General
- c. CIBC Bank, USA's Omnibus Reply in Support of the 9019 Motion and Response to (I) Committee's Objection and (II) DHS's Objection [Doc. No. 1272] filed April 22, 2025

Related Documents:

- a. Notice of Hearing and Response Deadline Regarding Consent Motion for Order Approving Settlement Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure [Doc. No. 780] filed October 13, 2024
- b. Certificate of Service [Doc. No. 798] filed October 18, 2024
- c. Consent Motion to Appoint Mediator and to Continue Certain Matters Scheduled for December 9, 2024 [Doc. No. 925] filed November 26, 2024
- d. Order entered Granting Consent Motion to Appoint Mediator and to Continue Certain Matters Scheduled for December 9, 2024 [Doc. No. 926] entered November 26, 2024
- e. Proposed Amended Order [Doc. No. 928] filed November 26, 2024
- f. Amended Order [Doc. 929] entered November 26, 2024
- g. Notice of Selected Mediator [Doc. No. 925] filed December 2, 2024
- h. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1002] filed January 7, 2025

- i. Order Granting Motion to Continue/Reschedule Hearing [Doc. No. 1004] entered January 8, 2025
- j. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1189] filed March 11, 20225
- k. Order Granting Consent Motion to Continue/Reschedule Hearing [Doc. No. 1207] entered March 11, 2025

Status: This matter is going forward.

- 2. CIBC's Motion for Relief from the Automatic Stay [Doc. No. 898] filed November 14, 2024

Objection/Response Deadline:

- a. March 6, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. Objection and Reservation of Rights to CIBC Bank, USA's Motion for Relief from the Automatic Stay [Doc. No. 1174] filed March 6, 2025 by the Official Committee of Unsecured Creditors
- b. CIBC Bank USA's Reply in Support of Motion for Relief from the Automatic Stay [Doc. No. 1271] filed April 22, 2025

Related Documents:

- a. Notice of Hearing and Response Deadline Regarding CIBC's Motion for Relief from the Automatic Stay [Doc. No. 900] filed November 14, 2024
- b. Affidavit of Service [Doc. No. 919] filed November 22, 2024
- c. Consent Motion to Appoint Mediator and to Continue Certain Matters Scheduled for December 9, 2024 [Doc. No. 925] filed November 26, 2024
- d. Order entered Granting Consent Motion to Appoint Mediator and to Continue Certain Matters Scheduled for December 9, 2024 [Doc. No. 926] entered November 26, 2024
- e. Proposed Amended Order [Doc. No. 928] filed November 26, 2024
- f. Amended Order [Doc. 929] entered November 26, 2024
- g. Notice of Selected Mediator [Doc. No. 925] filed December 2, 2024

- h. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1002] filed January 7, 2025
- i. Order granting Motion to Continue/Reschedule Hearing [Doc. No. 1004] entered January 8, 2025
- j. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1189] filed March 11, 20225
- k. Order Granting Consent Motion to Continue/Reschedule Hearing [Doc. No. 1207] entered March 11, 2025

Status: This matter is going forward.

- 3. CIBC's Motion to Dismiss the Chapter 11 Cases [Doc. No. 901] filed November 14, 2024

Objection/Response Deadline:

- a. March 6, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. Response and Reservation of Rights of the United States Trustee Regarding CIBC's Motion to Dismiss Chapter 11 Cases [Doc. No. 918] filed November 22, 2024
- b. Debtors' Statement in Support of CIBC's Motion to Dismiss [Doc. No. 1171] filed March 6, 2025
- c. Objection and Reservation of Rights to CIBC Bank, USAs Motion to Dismiss the Chapter 11 Cases [Doc. No. 1172] filed March 6, 2025 by the Official Committee of Unsecured Creditors
- d. CIBC Bank USA's Reply in Support of Motion to Dismiss [Doc. No. 1270] filed April 22, 2025

Related Documents:

- a. Notice of Hearing and Response Deadline Regarding CIBC's Motion to Dismiss the Chapter 11 Cases [Doc. No. 902] filed November 14, 2024
- b. Affidavit of Service [Doc. No. 919] filed November 22, 2024
- c. Consent Motion to Appoint Mediator and to Continue Certain Matters Scheduled for December 9, 2024 [Doc. No. 925] filed November 26, 2024

- d. Order entered Granting Consent Motion to Appoint Mediator and to Continue Certain Matters Scheduled for December 9, 2024 [Doc. No. 926] entered November 26, 2024
- e. Proposed Amended Order [Doc. No. 928] filed November 26, 2024
- f. Amended Order [Doc. 929] entered November 26, 2024
- g. Notice of Selected Mediator [Doc. No. 925] filed December 2, 2024
- h. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1002] filed January 7, 2025
- i. Order granting Motion to Continue/Reschedule Hearing [Doc. No. 1004] entered January 8, 2025
- j. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1189] filed March 11, 2025
- k. Order Granting Consent Motion to Continue/Reschedule Hearing [Doc. No. 1207] entered March 11, 2025

Status: This matter is going forward.

4. Amended Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors' Estates, (II) Exclusive Settlement Authority, and (III) a Bridge Order Extending the Challenge Deadline as Appropriate [Doc. No. 1183] filed March 9, 2025.

Objection/Response Deadline:

- a. April 17, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. CIBC's Objection to the Amended Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes Of Action on Behalf of the Debtors' Estates, (II) Exclusive Settlement Authority, and (III) a Bridge Order Extending the Challenge Deadline as Appropriate [Doc. No. 1265] filed April 17, 2025
- b. Debtors' Objection to the Amended Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing and Authority to Commence and Prosecute Certain Claims and Causes Of Action on Behalf of the Debtors' Estates, (II) Exclusive Settlement Authority, and (III) a Bridge Order Extending the Challenge Deadline as Appropriate [Doc. No. 1266] filed April 17, 2025

Related Documents:

- a. Notice of Hearing and Response Deadline [Doc. No. 1186] filed March 10, 2025
- b. Text Order [Doc. No. 1205] entered March 11, 2025
- c. Certificate of Service [Doc. No. 1206] filed March 11, 2025
- d. Text Order [Doc. No. 1216] entered March 14, 2025
- e. Amended Notice of Hearing [Doc. No. 1217] filed March 14, 2025

Status: This matter is going forward.

5. Motion for Relief from Stay and Payment of Administrative Claim [Doc. No. 879] filed November 14, 2024

Objection/Response Deadline:

- a. January 8, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. Debtors' Objection to Motion for Relief from Automatic Stay and Adequate Protection and Motion to Assume or Reject Executory Contracts [Doc. No. 1005] filed January 8, 2025

Related Documents:

- a. Notice of Hearing and Response Deadline [Doc. No. 882] filed November 14, 2024
- b. Notice of Hearing to be Refiled [Doc. No. 908] entered November 19, 2024
- c. Amended Notice of Hearing [Doc. No. 912] filed November 20, 2024
- d. Stipulation [Doc. No. 935] filed November 29, 2024
- e. Consent Order [Doc. No. 937] filed December 2, 2024
- f. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1029] filed January 9, 2025
- g. Order Granting Motion to Continue/Reschedule Hearing [Doc. No. 1030] entered January 10, 2025
- h. Consent Motion to Continue/Reschedule Hearing [Doc. No. 1188] filed March 11, 2025

- i. Order Granting Consent Motion to Continue/Reschedule Hearing [Doc. No. 1197] entered March 11, 2025

Status: This matter is going forward.

ADDITIONAL MATTERS CONTINUED

6. Application for Administrative Expenses under Ascot Long Term Care Insurance Program and Payment Thereof [Doc. No. 1164] filed February 28, 2025

Objection/Response Deadline:

- a. March 24, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. Objection to Application for Allowance and Payment of Administrative Expense Priority Claim [Doc. No. 1228] filed March 24, 2025

Related Documents:

- a. Text Order [Doc. No. 1168] entered March 4, 2025
- b. Notice of Hearing [Doc. No. 1176] filed March 6, 2025
- c. Corrected Objection to Application [Doc. No. 1229] filed March 26, 2025
- d. Stipulation and Consent to Continue Hearing on Application for Allowance and Payment of Administrative Expense Priority Claim Under Ascot Long Term Care Insurance Program [Doc. No. 1274] filed April 22, 2025

Status: Subject to Court approval, this matter will be continued to June 17, 2025.

MATTER SUBMITTED UNDER CERTIFICATION OF NO OBJECTION:

7. Motion for Relief From Stay by Goodrich and Geist, PC on Behalf of Kimberly Lewonas as Administratrix of the Estate of Patricia Daugherty [Doc. No. 1221], filed March 19, 2025

Objection / Response Deadline:

- a. April 7, 2025

Objections / Responses Filed:

- a. None

Related Documents:

- c. Hearing on Motion for Relief From Stay by Goodrich and Geist, PC on Behalf of Kimberly Lewonas as Administratrix of the Estate of Patricia Daugherty [Doc. No. 1222] filed March 19, 2025
- d. Certificate of No Objection [Doc. No. 1253] filed April 9, 2025
- e. Default Order Granting Motion [Doc. No. 1254] entered April 10, 2025

Status: Order granting motion entered April 10, 2025 [Doc. No. 1254]

8. Second Application for Compensation – Interim for Bass, Berry & Sims PLC [Doc. No. 1225], filed March 20, 2025

Objection / Response Deadline:

- a. April 3, 2025

Objections / Responses Filed:

- a. None

Related Documents:

- a. Hearing on Second Interim Application for Compensation [Doc. No. 1226] filed March 20, 2025
- b. Certificate of No Objection [Doc. No. 1256] filed April 10, 2025
- c. Default Order Approving Application [Doc. No. 1261] entered April 11, 2025

Status: Order granting motion entered April 11, 2025 [Doc. No. 1261]

9. Second Application for Compensation – Interim for Raines Feldman Littrell LLP [Doc. No. 1230], filed March 26, 2025

Objection / Response Deadline:

- b. April 9, 2025

Objections / Responses Filed:

- b. None

Related Documents:

- d. Hearing on Second Interim Application for Compensation [Doc. No. 1231] filed March 26, 2025
- e. Certificate of No Objection [Doc. No. 1255] filed April 10, 2025
- f. Default Order Approving Application [Doc. No. 1258] entered April 11, 2025

Status: Order granting motion entered April 11, 2025 [Doc. No. 158]

10. Motion for Relief from Mistake in Order Approving First Interim Fee Application of Ankura Consulting Group, Inc. and for Entry of a Corrected Error [Doc. No.1233] filed March 28, 2025.

Objection/Response Deadline:

- a. April 25, 2025 at 4:00 p.m. (EST)

Objections/Responses Filed:

- a. None

Related Documents:

- a. Notice of Hearing and Response Deadline [Doc. No. 1234] filed March 28, 2025
- b. Certificate of Service [Doc. No. 1235] filed March 28, 2025
- c. Certificate of No Objection [Doc. No. 1269] filed April 22, 2025
- d. Default Order Granting Motion [Doc. No. 1273] entered April 22, 2025

Status: Order granting motion entered April 22, 2025 [Doc. No. 1273]

Dated April 22, 2025
Pittsburgh, Pennsylvania

Respectfully submitted:

RAINES FELDMAN LITRELL, LLP

By: /s/ Daniel R. Schimizzi
Daniel R. Schimizzi (PA ID No. 311869)
Michael J. Roeschenthaler (PA ID No. 87647)
Mark A. Lindsay (PA ID No. 89487)
Sarah E. Wenrich (PA ID No. 325834)
11 Stanwix Street, Suite 1400
Pittsburgh, PA 15222
Telephone: 412-899-6460
Email: dschimizzi@raineslaw.com
mroeschenthaler@raineslaw.com
mlindsay@raineslaw.com
swenrich@raineslaw.com

*Local Counsel to the Debtors and
Debtors in Possession*

-AND

Glenn B. Rose (*pro hac vice*)
Alfonso Cuen (*pro hac vice*)
BASS, BERRY & SIMS PLC
21 Platform Way South, Suite 3500
Nashville, TN 37203
Telephone (615) 742-6200
Facsimile (615) 742-6293
grose@bassberry.com
alfonso.cuen@bassberry.com

*Counsel to the Debtors and
Debtors in Possession*